

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PROFESSOR MASAHIRO IIDA,

Plaintiff,

vs.

INTEL CORPORATION,

Defendant.

Case No. 6:22-cv-00662-ADA

**DECLARATION OF ANDREW T. NGUYEN REGARDING INTEL CORPORATION'S
MOTION FOR INTRA-DISTRICT TRANSFER PURSUANT TO 28 U.S.C. § 1404(A)**

I, Andrew T. Nguyen, declare as follows:

1. I am an attorney at the law firm of Munger, Tolles & Olson LLP, counsel for Defendant Intel Corporation in the above-captioned action. I provide this declaration in support of Intel's motion for intra-district transfer. I have personal knowledge of the facts stated herein and, if called to testify, could and would competently testify thereto.

2. The Court has not yet set a date for trial in this action, although a draft procedural schedule suggests a trial date sometime around March or April of 2024. Google Flights currently does not provide flight schedules or prices past August 17, 2023. For an estimate, I searched for roundtrip flights departing Sunday, March 26, 2023, and returning Friday, March 31, 2023, which serve as a proxy for flights to trial.

3. Attached hereto as **Exhibit 1** is a true and correct copy of a list of commercial flights available from Norman Y. Mineta San Jose International Airport to Austin-Bergstrom International Airport from Google Flights, accessed on September 22, 2022.

4. Attached hereto as **Exhibit 2** is a true and correct copy of a list of commercial flights available from Norman Y. Mineta San Jose International Airport to Waco Regional Airport from Google Flights, accessed on September 22, 2022.

5. Attached hereto as **Exhibit 3** is a true and correct copy of a list of commercial flights available from Toronto Pearson International Airport to Austin-Bergstrom International Airport from Google Flights, accessed on September 22, 2022.

6. Attached hereto as **Exhibit 4** is a true and correct copy of a list of commercial flights available from Toronto Pearson International Airport to Waco Regional Airport from Google Flights, accessed on September 22, 2022.

7. Attached hereto as **Exhibit 5** is a true and correct copy of a list of commercial flights available from Penang International Airport to Austin-Bergstrom International Airport from Google Flights, accessed on September 22, 2022.

8. Attached hereto as **Exhibit 6** is a true and correct copy of a list of commercial flights available from Penang International Airport to Waco Regional Airport from Google Flights, accessed on September 22, 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 23, 2022 in San Francisco, California.

A handwritten signature in black ink, appearing to be 'AT Nguyen', written over a horizontal line.

Andrew T. Nguyen